



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

TRUC

AUG 12 1996

OFFICE OF
SOLID WASTE AND EMERGENCY
RESPONSE

MEMORANDUM

SUBJECT: National Remedy Review Board Recommendations on the Coleman
Evans Wood Preserving Site.

FROM: Bruce Means, Chair *Bruce Means*
National Remedy Review Board

TO: Richard D. Green, Acting Director
Waste Management Division
EPA Region 4

Purpose.

The purpose of this memorandum is to document the findings of the National Remedy Review Board (NRRB) on the proposed remedial action for the Coleman Evans Wood Preserving Site in Florida.

Background.

As you recall, the Administrator established the NRRB as one of the October 1995 Superfund Administrative Reforms to help control remedy costs and promote consistent and cost-effective decisions. The Board will review all proposed cleanup actions where: (1) the estimated cost of the preferred alternative exceeds \$30 million, or (2) the preferred alternative costs more than \$10 million and is 50% more expensive than the least-costly, protective, ARAR-compliant alternative. In its review, the NRRB considers the nature and complexity of the site; health and environmental risks; the range of alternatives that address site risks; the quality and reasonableness of the cost estimates for alternatives; regional, State/tribal, and other stakeholder opinions on the proposed actions (to the extent they are known at the time of review); and any other relevant factors or program guidance.

Generally, the NRRB makes "advisory recommendations" to the appropriate Regional decision maker before the Region issues the proposed plan. These

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recommendations are then to be included in the Administrative Record for the site. While the Region is expected to give the Board's recommendations substantial weight, other important factors, such as subsequent public comment or technical analyses of remedial options, may influence the final Regional decision. It is important to remember that the NRRB does not change the Agency's delegation authorities or alter in any way the public's current role in site decisions. This Reform is intended to focus the program's extensive experience on decisions at a select number of high stakes sites.

Findings

The NRRB met with the Regional and State Remedial Project Managers (RPMs) for the Coleman Evans Wood Preserving site on May 8, 1996. Based on that review and discussion, the members of the NRRB make the following observations.

The Board is in general agreement with the preferred cleanup approach (Alternative 4), which relies primarily upon thermal desorption to address remedial action objectives: preventing PCP leaching to groundwater, and mitigating direct human contact with or ingestion of dioxin. The remedy complies with the preference for treating principal threats stated in the National Contingency Plan, and complies generally with EPA's presumptive remedy guidance on treating soils at wood treater sites (OSWER Directive 9200.5-162). The Board supports cleaning up the site to levels indicated in the Region's proposal, which should allow unrestricted site use at an estimated cost of approximately \$20 million.

The Board notes two areas of concern, however. First, although thermal desorption remains a viable option for addressing health threats at this site, the Board cautions that the technology may not effectively treat on-site soils to the cleanup levels identified by the Region. Second, the State of Florida provided information to the Region the day before the NRRB meeting that may substantially affect dioxin soil cleanup requirements. They informed the Region that a new State law considers dioxin soil levels greater than seven parts per trillion (ppt) to be unacceptable. Neither the NRRB nor the Region can, at this time, completely evaluate the relative merits and cost effectiveness of various cleanup options, since extent of contamination sampling at these levels has not been conducted.

Region 4 is currently evaluating whether this law constitutes an applicable or relevant and appropriate requirement (ARAR). Board members noted that the seven ppt dioxin cleanup level is generally inconsistent with several dioxin decisions at other sites. Further, the Board questions whether current treatment technologies, such as thermal desorption or incineration, can reach this level.

Given the concerns noted above, the NRRB recommends that Region 4:

- Work with the Florida Department of Environmental Protection to clarify the cleanup objectives and requirements for the contaminated soil and groundwater at the site with particular emphasis on the seven ppt dioxin ARAR issue.
- Conduct a pilot-scale study on the effectiveness of thermal desorption for treating PCP and dioxin-contaminated soils at the site.
- Explore the feasibility and cost of enhancing Alternative 2, containment, given the uncertainty in the potential effectiveness of thermal desorption and the Region's previous experience in evaluating other treatment options for site contamination. This enhancement may include, but would not be limited to, a combination cap and slurry wall or an above ground containment vault.
- Consider a hybrid alternative that would employ both treatment and containment of the same soils. The Region may find it more cost effective to use a treatment technology other than thermal desorption (e.g., bioremediation) to address the principal threat posed by PCP and high dioxin levels, followed by a less expensive containment system or barrier (e.g., soil cover) to prevent residual dioxin exposures.
- Further explore the feasibility of Alternative 3, incineration, which should be able to meet Regional remediation goals at only slightly higher estimated cost. The NRRB appreciates, however, that the Region must fully consider community and State concerns regarding the use of incineration at this site.

The NRRB appreciates the Region's efforts to work closely with the State and community to identify the current proposed remedy. The Board members also express their appreciation to both the Region and the State of Florida for their participation in the review process. We encourage Region 4 management and staff to work with their Regional NRRB representative and the Region 4/10 Regional Accelerated Response Center at Headquarters to discuss appropriate follow-up actions.

Please do not hesitate to give me a call if you have any questions at 703-603-8815.

cc: S. Luftig
E. Laws
T. Fields
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